# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

KOREA ADVANCED INSTITUTE OF SCIENCE AND TECHNOLOGY

Plaintiff,

Case No. 2022-CV-00317

v.

KIP CO., LTD. f/k/a KAIST IP Co., Ltd.; P&IB CO., LTD.; IN GYOO KANG; KIPB LLC f/k/a KAIST IP US LLC; PAULINA FUNDINGCO, LLC; and U.S. BANK NATIONAL ASSOCIATION

Defendants.

#### STIPULATED MOTION TO EXTEND DEADLINES

Plaintiff Korea Advanced Institute of Science and Technology ("KAIST") and Defendants KIP Co, Ltd., P&IB Co., Ltd., In Gyoo Kang, KIPB LLC, Paulina FundingCo, LLC, and U.S. Bank National Association (collectively "Defendants") hereby stipulate and agree as follows:

- 1. On April 20, 2022, Plaintiff KAIST filed an amended complaint against the Defendants. Dkt. No. 30.
- 2. The Defendants filed and served motions to dismiss KAIST's amended complaint and supporting papers on June 3, 2022. Dkt. Nos. 34–39.
- 3. The parties hereby stipulate that KAIST's deadline to file and serve its responses to these motions shall be extended to July 25, 2022.

- 4. The parties hereby stipulate that Defendants' deadline to file and serve replies in support of their respective motions shall be extended to August 15, 2022.
- 5. Good cause exists for the requested extensions due to scheduling issues and competing case deadlines, giving rise to the need for additional time.

Dated this 16th day of June 2022.

#### /s/Daniel A. Manna

Daniel A. Manna, SBN 1071827 Jerome C. Mohsen, SBN 1097525 GASS TUREK LLC 241 N. Broadway, Suite 300 Milwaukee, Wisconsin 53202 Tel: 414-223-3300

Fax: 414-223-3300 Fax: 414-224-6116 manna@gassturek.com mohsen@gassturek.com

Attorneys for Plaintiff Korea Advanced Institute of Science and Technology

### /s/ Anastasiya Maione

Adam L. Hoeflich (No. IL 6209163)
Anastasiya Maione (No. IL 6327120)
Lee Mason (No. IL 6330090)
BARTLIT BECK LLP
54 W. Hubbard Street, Suite 300
Chicago, IL 60654
(312) 494-4400
adam.hoeflich@bartlitbeck.com
stacy.maione@bartlitbeck.com
lee.mason@bartlitbeck.com

Jason C. Murray (No. CO 43652) BARTLIT BECK LLP 1801 Wewatta Street, Suite 1200 Denver, CO 80202 (303) 592-3100 jason.murray@bartlitbeck.com

Steven M. Biskupic, SBN 1018217
Justin J. Dreikosen, SBN 1094426
BISKUPIC & JACOBS, S.C.
1045 West Glen Oaks Lane, Suite 106
Mequon, WI 53092
Office: 262-241-3300
Fax: 866-700-7640
sbiskupic@biskupicjacobs.com
jdreikosen@biskupicjacobs.com

Counsel for Defendant Paulina FundingCo, LLC

## /s/ Christopher I. Schreiber

Christopher J. Schreiber, SBN 1039091 Alexander M. DeGuire, SBN 1097948 MICHAEL BEST & FRIEDRICH LLP 790 N. Water Street, Suite 2500 Milwaukee, WI 53202 (414) 271-6560 cjschreiber@michaelbest.com amdeguire@michaelbest.com

Counsel for Defendant U.S. Bank National Association

## /s/ Hyung Gyu Sun

Hyung Gyu Sun (No. VA 93070)
David Ludiwg (No. VA 73157)
DUNLAP BENNETT & LUDWIG
211 Church Street SE
Leesburg, VA 20175
(703) 777-7319
hsun@dbllawyers.com
dludwig@dbllawyers.com

Robert P. Greenspoon (No. IL 6229357) DUNLAP BENNETT & LUDWIG 333 N. Michigan Ave Suite 2700 Chicago, IL 60601 (312) 551-9500 rgreenspoon@dbllawyers.com

Counsel for Defendants KIP Co., Ltd., P&IB Co., Ltd., In Gyoo Kang, and KIPB LLC